

STATE OF KANSAS



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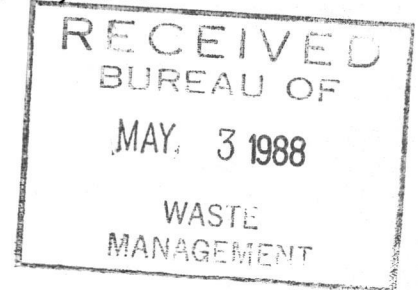
Stanley C. Grant, Ph.D., Secretary

Gary K. Hulett, Ph.D., Under Secretary

April 29, 1988

William E. Dame, Manager
Olin Water Services
3155 Fiberglass Road
Kansas City, Kansas 66115

RE: Hazardous Waste Compliance Evaluation Inspection
EPA Identification Number KSD000203638



Mr. Dame:

On April 20, 1988 a hazardous waste compliance inspection was conducted at Olin Water Services, 3155 Fiberglass Road, Kansas City, Kansas. This inspection was to determine this facilities compliance with state and federal regulations concerning hazardous waste.

Based on information provided this inspection shows that the facility generates various laboratory and product waste (See supplement A & B), and the amount exceeds 1000 kilograms per month. Generation in excess of 1000 kilograms per month requires compliance with applicable 40CFR Part 262 standards as adopted by K.A.R. 28-31-4. This facility is also a permitted storage facility, subject to the requirements of 40CFR, Parts 260 to 264, 270, 124 and specific conditions of Permit Number KSD000203638.

The current inspection identified the following items not in compliance with state and federal regulations.

1. Generators are required to identify all solid wastes and determine if that waste is a hazardous waste as shown in 40CFR 261.2 as adopted by K.A.R. 28-31-4. These standards require the identification of the paint and primer wastes contained in the paint booth filters. Identification shall be completed by June 1, 1988.
2. Generators shall keep a copy of each biennial report and exception report for a period of at least three years (40CFR Part 262, Subpart D K.A.R. 28-31-4(f)). The 1985 report was not available for this inspection. Shall be provided for the June 1, 1988 followup.



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RCRA Records Center

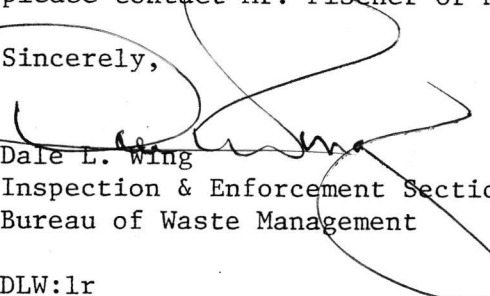
William E. Dame, Manager
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Page 2.

3. Operators of container storage facilities shall keep all containers marked in accordance with the standards of K.A.R. 28-31-4(9)(2) and (3). Some containers in storage display weathered labels which are becoming difficult to read. These labels shall be replaced.
4. A pallet of assorted laboratory chemicals has been packaged and identified as hazardous waste. This waste material is not included in your storage permit, therefore, must be removed before the end of the allowed 90-day storage period. This package was dated 4-4-88 which requires its removal by 7-4-88.

During this inspection the use of a satellite accumulation area was discussed in detail. Following the discussion it was determined that satellite accumulation sites were to be established in the laboratory areas. When implementing this activity you may wish to review the standards for satellite accumulation K.A.R. 28-31-4(j) and the mixed solvent rules of 40CFR, Subpart D 261.31. A review of this paragraph in Mr. Fischer's 1987 report is also recommended.

Thank you for your cooperation and assistance with this inspection. If there are any questions regarding this inspection and the requested corrections, please contact Mr. Fischer or Mr. Ron Smith at 913-296-1604.

Sincerely,



Dale L. Wing
Inspection & Enforcement Section
Bureau of Waste Management

DLW:lr
C: Hazardous Waste
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File